

Judge Robert S. Lasnik

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff

v.

SAJED AL-MAAREJ

Defendant.

NO. 2:23-cr-000147-RSL

AFFIDAVIT OF DEAN W. GIBONEY

I, Dean W. Giboney, state as follows:

1. I am a Special Agent of the Federal Bureau of Investigation (FBI) currently assigned to the white-collar crime squad in the Seattle Field Office. I have been employed as a Special Agent of the FBI since August 2004.

2. I am an investigative law enforcement officer of the United States within the meaning of 18 U.S.C. § 2510(7). As such, I am empowered to conduct investigations of, and to make arrests for, violations of Title 18, United States Code, Sections 1341, 1349, 1343, 1956, 1957 and related offenses. I have received basic law enforcement training, including training at the FBI Academy, as well as other specialized federal law enforcement training. In the course of my official duties as a Special Agent, I have participated in and supervised investigations involving a variety of kidnapping, narcotics,

1 firearms, money laundering, identity theft, wire fraud, bank fraud, mail fraud, health care
2 fraud and conspiracy offenses. As a result, I have experience with the various methods
3 and practices used by criminals to commit crimes through the use of computers, the
4 internet and other digital devices such as cellular telephones.

5 3. I am one of the case agents assigned to the investigation of Simple Refunds
6 and Sajed Al-Maarej.

7 4. On September 26, 2023, law enforcement agents executed valid federal
8 search warrants at two locations associated with Sajed Al-Maarej in Dearborn, Michigan.
9 I was part of the team that searched Al-Maarej's home located on Williamson Street in
10 Dearborn, Michigan.

11 ***Red Cadillac Escalade (Subject Property 1)***

12 5. Law enforcement located a 2021 Cadillac Escalade ESV 4-door Sports
13 Platinum vehicle with VIN: 1GYS3RKL1MR166941 in the driveway of the Williamson
14 Street home. Attached as Exhibit 301 hereto is a true and correct copy of photographs law
15 enforcement took on the day of the search showing the Escalade and its VIN.

16 6. Al-Maarej purchased the 2021 Cadillac Escalade from COPART, an online
17 auto dealer, on or about May 24, 2022. Attached as Exhibit 302 are true and correct
18 copies of insurance documents our team seized from Al-Maarej's Google account
19 showing that he owned the Escalade and registered it at the Williamson Street property.

20 7. As explained in more detail in the affidavit of Forensic Accountant Aireen
21 Agbayani, Al-Maarej used proceeds of his fraudulent refunding scheme to purchase the
22 Escalade.

23 ***Cash Found in Al-Maarej's Room***

24 8. Investigators located several safes in a locked room at the Williamson
25 Street address. In the same room, investigators found documents and other items
26 belonging to Al-Maarej, leading the team to believe that this was Al-Maarej's room.
27

1 9. Attached as Exhibit 303 are true and correct copies of several images of a
2 safe the search team located on a shoe rack in Al-Maarej's bedroom. The search team
3 seized approximately \$90,350 (**Subject Property 2**) from the shoe rack safe.

4 10. As shown in Exhibit 303-4, investigators found several credit cards and a
5 key in the shoe rack safe, in addition to the more than \$90,000. The credit cards bore Al-
6 Maarej's name.

7 11. The key opened a second "suitcase" safe investigators found on the floor of
8 the same bedroom. Attached hereto as Exhibit 304 are true and correct copies of
9 photographs the search team took of the suitcase safe. In the suitcase safe, investigators
10 located \$100 bills totaling approximately \$45,000 (**Subject Property 3**).

11 ***Jewelry Found with Al-Maarej's Identifiers***

12 12. Investigators also located several items of jewelry in the Williamson Street
13 house.

14 13. Attached as Exhibit 305 hereto are a true and correct copies of photographs
15 of a sterling sliver, gold, and diamond Rolex watch that investigators found on a
16 nightstand in Al-Maarej's bedroom (**Subject Property 4**).

17 14. Attached as Exhibit 306 is a warranty certificate for the Rolex that
18 identifies the owner as Sajed Al-Maarej and the purchase date as September 6, 2022.

19 15. Agents found a silver David Yurman curb chain necklace, pave-set with
20 approximately 5.28 carats of black diamonds (**Subject Property 5**) in another room of
21 the Williamson Street house, on a table next to Al-Maarej's wallet and keys. Attached as
22 Exhibit 307 hereto is a true and correct copy of a photograph of the David Yurman
23 necklace.

24 16. Attached hereto as Exhibit 308 are images of packing slips agents found in
25 Al-Maarej's bedroom. The slips reflect shipments of jewelry from David Yurman to Al-
26 Maarej, including a packing slip for a silver curb chain necklace, shipped to Al-Maarej on
27 or about September 1, 2023, and a packing slip for a David Yurman armory chain

necklace, shipped to Al-Maarej on or about December 21, 2022. Agents did not locate the armory chain necklace during their search of the Williamson Street residence.

Other Items Found in Williamson Street

17. Attached hereto as Exhibit 309 is a true and correct copy of an image of an orange checked Amiri jacket found in Al-Maarej's bedroom.

18. Attached hereto as Exhibit 310 is a true and correct copy of an image of a go-kart found in the Williamson Street garage.

Heritage Parkway Search

19. In addition to the Williamson Street address, investigators searched a second residence associated with Al-Maarej in Dearborn Michigan on September 26, 2023. That residence is located on Heritage Parkway and was newly purchased by Al-Maarej.

20. Attached hereto as Exhibit 311 are true and correct copies of photographs law enforcement took during the search of the Heritage Parkway residence.

Digital Devices Search

21. Law enforcement sought and obtained authority to search digital devices seized from Al-Maarej. Attached as Exhibit 312 hereto is a true and correct copy of an image law enforcement seized from Al-Maarej's iPhone.

I declare under penalty of perjury that the foregoing is true and correct.

DATED this 11th day of December, 2024, in Seattle, Washington.


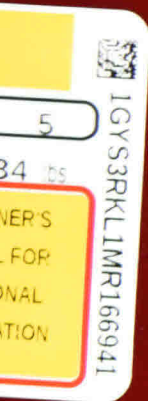


DEAN W. GIBONEY
Special Agent
Federal Bureau of Investigation


EXHIBIT 301





GM 

TRAILERING INFORMATION

 **1GYS3RKL1MR166941**

VEHICLE AND TRAILER MUST NOT EXCEED ANY OF THESE VALUES.

| | |
|--------------|---------------------|
| GVWR: | 3447 KG / 7600 LBS |
| GCWR: | 6350 KG / 14000 LBS |
| RGAWR: | 1950 KG / 4300 LBS |
| CURB WEIGHT: | 2751 KG / 6066 LBS |
| MAX PAYLOAD: | 696 KG / 1534 LBS |

SAE J2807 TRAILER WEIGHT RATING (TWR) FOR VEHICLE CONFIGURATION.

| | |
|--------------------|--------------------|
| CONVENTIONAL TWR: | 3447 KG / 7600 LBS |
| MAX TONGUE WEIGHT: | 345 KG / 760 LBS |


SEE OWNER'S MANUAL  FOR MORE INFORMATION



EXHIBIT 302

PROGRESSIVE
P.O. BOX 31260
TAMPA, FL 33631
NAIC Company Code: 37605

PROGRESSIVE
DIRECT Auto

Policy Number: 957313751

Underwritten by:
Progressive Marathon Insurance Co
Policyholder:
Sajed Almaarej
Page 1 of 1
June 22, 2022

Customer Service

1-800-776-4737
24 hours a day, 7 days a week

Verification of Insurance for

Sajed Almaarej

This verification of insurance is not an insurance policy and does not amend, extend or alter the coverage afforded by the policies listed herein. Notwithstanding any requirement, term or condition of any contract or other document with respect to which this verification of insurance may be issued or may pertain, the insurance afforded by the policies described herein is subject to all the terms, exclusions and conditions of the policies.

Please accept this letter as verification of insurance for this policy.

Policy and driver information

| | |
|---|-----------------------------|
| Policy number: | 957313751 |
| Policy state: | Michigan |
| Policy period: | Apr 11, 2022 - Oct 11, 2022 |
| There was no lapse in coverage during this policy period. | |
| Effective date: | Jun 22, 2022 |
| Drivers: Sajed Almaarej | Insured Driver |
| Address: | [REDACTED] |
| | Dearborn, MI 48126 |

Vehicle information

| | |
|--------------------------------|------------------------|
| Vehicle: | 2021 CADILLAC ESCALADE |
| Vehicle identification number: | 1GYS3RKL1MR166941 |

Coverage information

| | |
|---------------------------|--|
| Liability To Others | |
| Bodily Injury Liability | \$50,000 each person/\$100,000 each accident |
| Property Damage Liability | \$50,000 each accident |

EXHIBIT 303

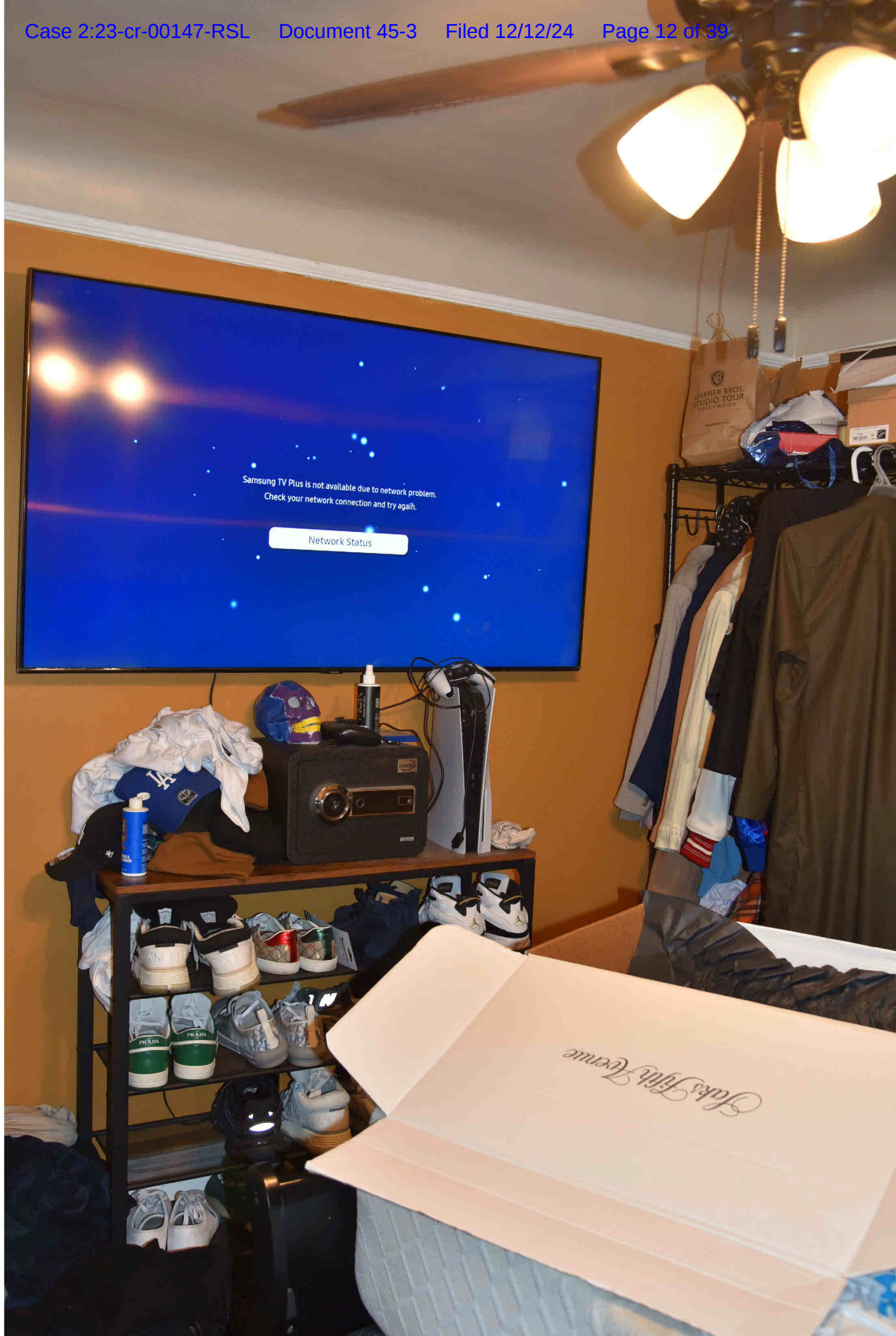


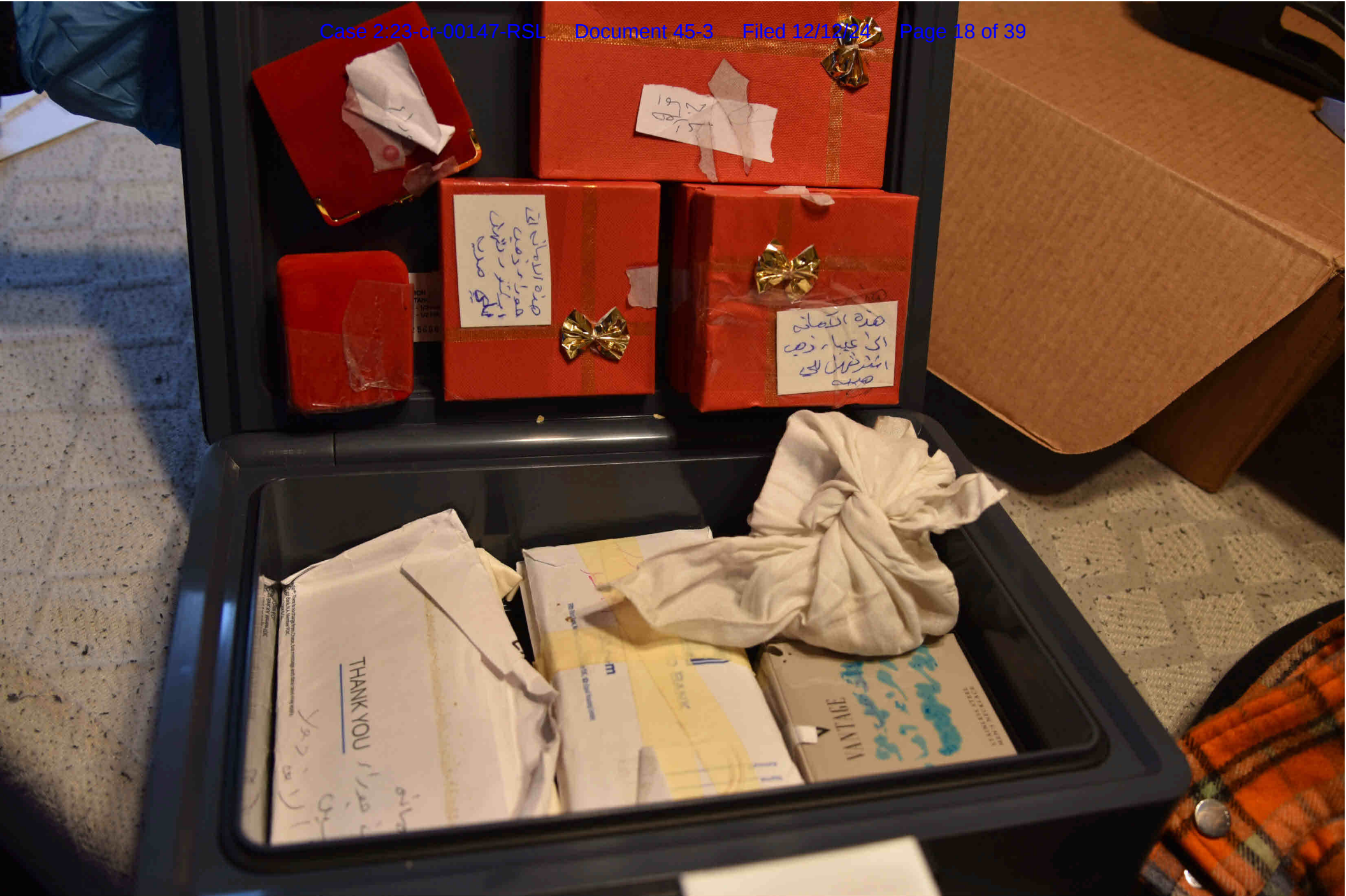


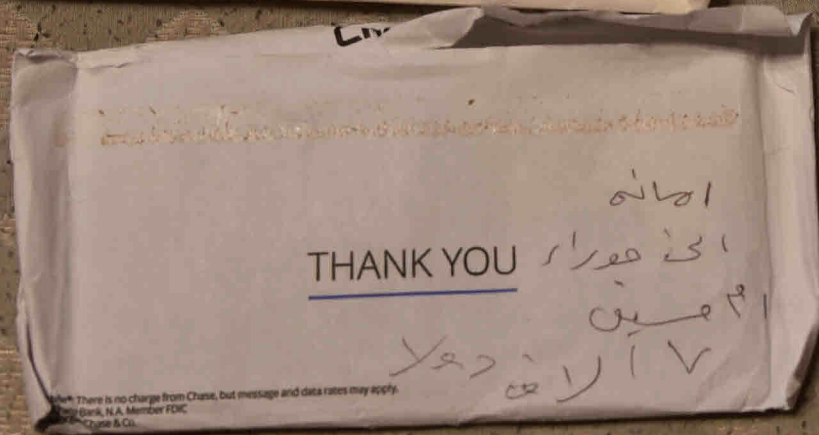
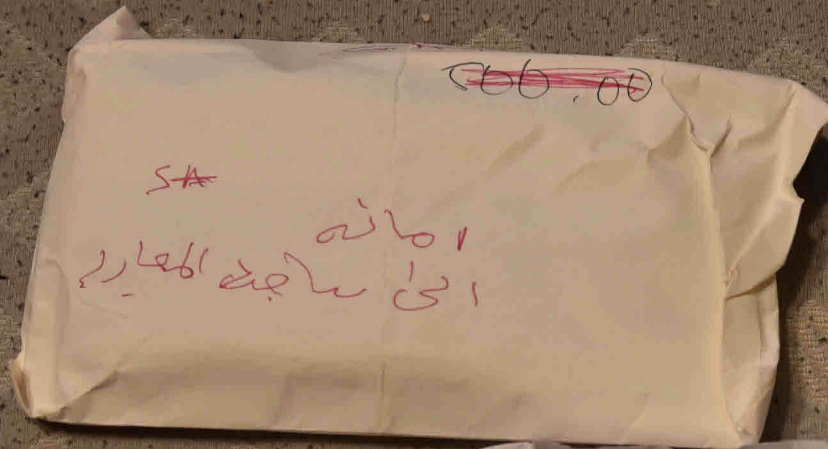




EXHIBIT 304







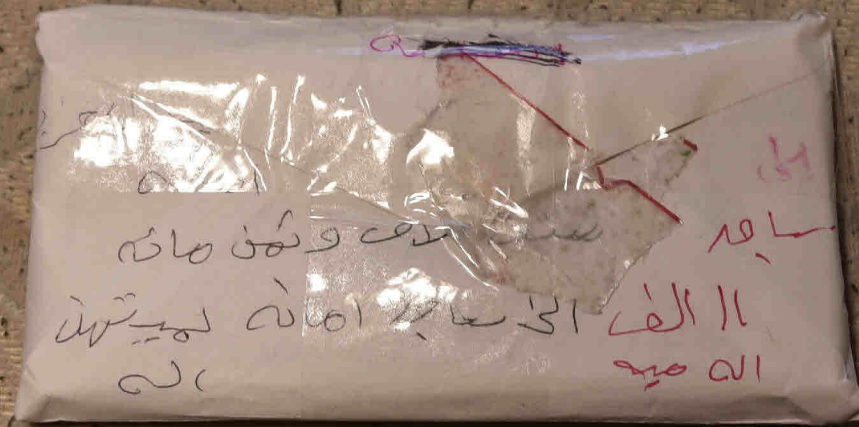




EXHIBIT 305



EXHIBIT 306

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| | |
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| Care Information | 1 |
| Setting Date on your watch | 1-2 |
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| Non Quick set | |
| Guarantee and Warranty | 3 |
| Warranty on Customization | |
| Trade - in & upgrade | 4 |
| Terms and condition | |

Warranty Certificate

Name: Sajed Almagrej
Model: 126303 Date: just
Serial No: EL095796
Date Of Purchase: Sep 6, 2022

* All our watches are water/splash resistant & not waterproof.

WATCHES WITH A SCREW-DOWN CROWN

WATCHES WITH A SCREW-DOWN CROWN

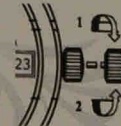
To set your watch, you must first unscrew the crown. Holding the crown firmly between your forefinger & thumb, turn the crown counter-clock wise. **DO NOT USE ANY TOOLS OR FORCEFULLY PULL ON THE CROWN.** The crown will turn 3-5 times & will then "pop out" to the neutral position. Automatic watches can be manually be wound while the crown is in this position. Refer to the manufacturer's manual for watch setting & functions instructions.

IMPORTANT: To ensure water resistance, be sure to screw in & tighten the crown once you have finished setting the watch.

1. To make the crown operational, unscrew it from the case by turning it counter-clockwise until it releases.
2. To reveal the crown, press it against the case until the threads engage, & turn clockwise until tight.

SETTING THE DATE ON YOUR WATCH

Most watches features a "quick-set" option to correct the date. The most common method is by pulling the crown out to the middle click; another method by means of a recessed button on the case edge. If your watch features a screw-down crown, please follow instructions above before attempting to pull out the crown.



Avoid using the quick-set feature to correct the date while the watch is set between 9 pm & 3 am, as this can interfere with the gears already engaged in bringing the date forward. Quick-setting the date between these times may cause damage to it & the repair will not be covered under warranty. In addition, most date features are designed for the date to be advanced forward only. It is advisable not to turn the time backwards past 3 am, unless specifically stated otherwise in the instruction manual. Turning the time backwards past 3 am will attempt to turn the date wheel backwards as well, which may damage the gears of your watch, which will not be covered under warranty.

1.

Quick Set

Manual Winding— Unscrew the crown counterclockwise until it pops out from the side (the winding position). Once there, begin to wind the crown clockwise about 25–30 times. This is the correct way to wind your watch. If you have not worn the watch for 1–2 days, you may need to wind it again before you wear it.

For the Date—Unscrew the crown counterclockwise until it pops out from the side (the winding position). Slightly tug on the crown to reach the 2nd extended position. To set the winding position. Slightly tug on the crown to reach the 2nd extended position twice, after date, wind the crown clockwise /counterclockwise past the midnight position twice, after which you can set the correct date. When completed, gently push & screw the crown tightly back into place.

For the Time—Unscrew the crown counterclockwise until it pops out from the side (the winding position). Extend the crown past the 2nd position, which is fully extended from the side. Wind the crown clockwise/ counterclockwise until you reach the appropriate time. When completed, gently push & screw the crown tightly back into place.

Non Quick Set

Manual Winding—Unscrew the crown counterclockwise until it pops out from the side (the winding position). Once there, begin to wind the crown clockwise about 25–30 times. This is best if you have not worn the watch for 1–2 days.

For the Date—Unscrew the crown counter-clockwise until it pops out from the side (the winding position). Slightly tug on the crown to reach the 2nd extended position. To set the date, wind the crown clockwise/counter-clockwise past the midnight position which will help you can set the crown clockwise/counter-clockwise gently push & screw the crown tightly back into place.

For the Time—Unscrew the crown counterclockwise until it pops out from the side (the 2nd extended position). To set the time, wind the crown clockwise (winding position). Reach the 2nd extended position. When completed, gently push & screw the crown tightly back into place.

Guarantee & Warranty

This warranty is only valid at Jewelry Unlimited & all warranty service must be performed by us. The warranty is voided for any products opened/ serviced by any other party. Our product are 100% genuine & most are guaranteed for one years from the date of purchase.

2



51-10815
WTH BEPSS
S10

EXHIBIT 307

DAVID YURMAN

DAVID YURMAN
PACKING SLIP

Shipment Summary:

| Transaction Number | Order Date | Ship Via | Tracking Number | Shipment Date |
|------------------------------------|------------------------------------|--------------------|-----------------|---------------|
| 2136859 | 12/21/2022 | FedEx Web Services | 392533213497 | 12/21/2022 |
| Item # | Description | U/M | QTY | |
| PK/STRBURSTTAG2020 192740818424 | DYR Starburst Holiday Ornament Tag | EA | 1.00 | |
| C40474MSS24 192740803225 | 8.4MM ARMORY CHAIN NECKLACE SIL | EA | 1.00 | |
| Total Quantity: | | | 2.00 | |

Thank you for shopping at David Yurman!

Returns / exchanges can be processed in store or online within 45 days. All returns must be unaltered, unworn and in saleable condition. Some exclusions may apply. In Store returns will require a sales receipt or proof of purchase to refund to the original form of payment. Gift recipients may exchange or receive a merchandise credit. Cash purchases will be refunded by company check within 4 - 6 weeks.

For US Domestic orders ONLY, print a prepaid shipping label for your return by visiting <https://returns.narvar.com/davidyurman/returns>

Need More Help?

For questions on a purchase made in store, please contact the store listed at the top of this slip.
Customer Care: 1-888-398-7626
Or EMAIL: CUSTOMERSERVICE@DAVIDYURMAN.COM

EXHIBIT 308

DAVID YURMAN

PACKING SLIP

Sold To:
Sayed AlmaarejShip To:
Sayed Almaarej

Shipment Summary:

| Order Number: | Order Date: | Ship Via: | Tracking Number: | Shipment Date: |
|--------------------------------|--------------------------------|-----------|------------------|----------------|
| C00456747 | 09/01/2023 | FedEx | 783225457038 | 09/01/2023 |
| Item # | Description | U/M | QTY | PK |
| N25444MSSABD26 192740883385 | 8MM CURB CHAIN NECKLACE BD SIL | EA | 1.00 | |
| Total Quantity: | | | 1.00 | |

Thank you for shopping at David Yurman!

Items are accepted for exchange, refund or merchandise credit within 30 days, accompanied by a sales receipt. All refunds will be issued to the original form of payment except cash purchases, which will be refunded by company check. Gift recipients may receive a merchandise credit. All returns must be unaltered, unworn, and in saleable condition. Used merchandise will not be accepted for refund or exchange unless defective. Personalized and custom designs, as well as items from the High Jewelry and EY Signature collections are final sale. Due to the donations we make to our charitable partners, our rubber bracelets are also final sale. For US Domestic orders ONLY, print a prepaid shipping label for your return by visiting <https://returns.narvar.com/davidyurman/returns>

Need More Help?

Customer Care: 1-888-398-7626

Or EMAIL:

CUSTOMERSERVICE@DAVIDYURMAN.COM

DAVID YURMAN

PACKING SLIP

Sold To:
Sajed Almaarej
[REDACTED]
Dearborn, MI 48126US

Ship To:
Sajed Almaarej
[REDACTED]
Dearborn, MI 48126-3171US

Shipment Summary:

| Transaction Number: | Order Date: | Ship Via: | Tracking Number: | Shipment Date: |
|------------------------------------|------------------------------------|--------------------|------------------|----------------|
| 2136859 | 12/21/2022 | FedEx Web Services | 392533211497 | 12/21/2022 |
| Item # | Description | U/M | QTY | |
| PK/STRBURSTTAG2020 192740818424 | DYR Starburst Holiday Ornament Tag | EA | 1.00 | |
| CH0474MSS24 192740850325 | 8.4MM ARMORY CHAIN NECKLACE SIL | EA | 1.00 | |
| | | | Total Quantity: | 2.00 |

Thank you for shopping at David Yurman!

Returns / exchanges can be processed in store or online within 45 days. All returns must be unaltered, unworn and in saleable condition. Some exclusions may apply. In Store returns will require a sales receipt or proof of purchase to refund to the original form of payment. Gift recipients may exchange or receive a merchandise credit. Cash purchases will be refunded by company check within 4 - 6 weeks.

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CUSTOMERSERVICE@DAVIDYURMAN.COM

EXHIBIT 309



EXHIBIT 310



EXHIBIT 311





EXHIBIT 312

